

IT IS SO ORDERED.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

**s/Dan Aaron Polster
DAN AARON POLSTER
U.S. DISTRICT JUDGE**

**IN RE: NATIONAL PRESCRIPTION
OPIATE LITIGATION**

Date: 2/19/2025

THIS DOCUMENT RELATES TO:

MDL 2804

*City of Rochester, NY v. Purdue Pharma,
L.P.*, No. 19-op-45853 (Track 12)

Case No. 1:17-md-2804

*County of Ogdensburg, NY v. Purdue
Pharma, L.P.*, No. 19-op-45825 (Track 22)

Judge Dan Aaron Polster

**OPTUMRX, INC.'S MOTION FOR LEAVE TO FILE UNDER SEAL ITS OPPOSITION
TO MOTION FOR LEAVE TO SERVE SUPPLEMENTAL DISCOVERY
AND CERTAIN EXHIBITS THERETO**

Pursuant to Local Rule 5.2, OptumRx, Inc. seeks leave to file under seal its opposition to the PEC's motion for leave to serve supplemental discovery and Exhibits A, F, G, H, I, and M to that opposition.

OptumRx requests leave to file these documents under seal to ensure there is no inadvertent disclosure of confidential information.

- Exhibit A to OptumRx's opposition brief contains ten years' worth of Highly Confidential – Attorneys' Eyes Only information regarding OptumRx's rebate contract terms, client contract terms, internal processes, and related financial data. The information is proprietary, competitively sensitive, and not otherwise available to the public. That information is trade secret material that would harm OptumRx and OptumRx's clients if disclosed to the public.
- OptumRx's opposition brief and Exhibits F, G, H, I, and M also contain information designated as Confidential by Purdue under the Protective Orders in the MDL. *See* ECF